

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

PARAGON COMPONENT)
SYSTEMS, LLC,)
Plaintiff,)
v.) Case No.: 1:24-cv-00246-CEA-CHS
QUALTIM, INC., CENTER FOR) District Judge Atchley
BUILDING INNOVATION, LLC,)
DRJ ENGINEERING, LLC,) Magistrate Judge Steger
INSPIRED PURSUITS, LLC,)
KIRK GRUNDAHL, and)
SUZANNE GRUNDAHL,)
Defendants.)

**PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST SUPPLEMENTAL
OR AMENDED COMPLAINT**

Under Federal Rule of Civil Procedure 15(a) and 15(d), Plaintiff Paragon Component Systems, LLC (“Paragon”) respectfully seeks leave to file a supplemental or amended complaint based on events that occurred after Paragon filed its original Complaint on July 23, 2024. Doc. 1. Paragon’s proposed First Supplemental Complaint, a copy of which is attached to this Motion as **Exhibit 1**, along with its Exhibits L through N, does not seek to alter the existing factual allegations and causes of action in its prior Complaint, Doc. 1. Rather, under Rule 15(d) Paragon seeks to assert an additional cause of action, for tortious interference, based on events that have occurred in late October 2024 to the present. **Exhibit 1** incorporates the allegations of the existing Complaint by reference then adds new allegations, a new cause of action, and new prayers for relief. **Exhibit 1** also includes statutory references to attorney-fee provisions.

In the alternative, were the Court to conclude that amendment under Rule 15(a) rather than supplementation under Rule 15(d) is the more appropriate procedural vehicle, then Paragon would

file as a matter of course or move the Court to permit Paragon to file **Exhibit 1** as an amendment to its Complaint, Doc. 1, by adding the new allegations, claim, and prayers for relief.

Paragon also relies upon its supporting brief. As explained in Paragon's brief, there is good cause for granting this motion because it would promote judicial efficiency, does not involve undue delay, and would not prejudice Defendants.

Respectfully submitted this 10th day of December 2024.

s/ Stephen E. Kabakoff

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CERTIFICATE OF SERVICE

I certify that on December 10, 2024 a copy of the foregoing Plaintiff's Motion for a Leave to File an Amended Complaint is being served on all counsel of record by electronically filing it via the Court's filing system.

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